

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA

W. A. DREW EDMONDSON, in his)
capacity as ATTORNEY GENERAL)
OF THE STATE OF OKLAHOMA and)
OKLAHOMA SECRETARY OF THE)
ENVIRONMENT C. MILES TOLBERT,)
in his capacity as the)
TRUSTEE FOR NATURAL RESOURCES)
FOR THE STATE OF OKLAHOMA,)

Plaintiff,)

vs.)

TYSON FOODS, INC., et al,)

Defendants.)

4:05-CV-00329-TCK-SAJ

THE VIDEOTAPED DEPOSITION OF

ROBERT TAYLOR, PhD, produced as a witness on
behalf of the Defendants in the above styled and
numbered cause, taken on the 8th day of January,
2008, in the City of Tulsa, County of Tulsa, State
of Oklahoma, before me, Lisa A. Steinmeyer, a
Certified Shorthand Reporter, duly certified under
and by virtue of the laws of the State of Oklahoma.

1 you've seen yourself as an advocate for poultry
2 growers; is that right?

3 A I don't consider myself an advocate of
4 anything other than competitive markets in a balance
5 of market power, and that can go either way.

02:50PM

6 Recently it has gone, in my opinion, to favor the
7 integrators over the growers, but it could easily
8 swing the other way, as it has at times past with
9 labor unions and so forth.

10 Q Do you believe that since the early 1990's
11 that contract poultry growers have needed advocates?

02:50PM

12 A I've never even thought about it that way.

13 Q Just trying to determine if your beliefs now
14 are consistent with testimony you gave in a
15 deposition last year where you mentioned that you
16 saw yourself as an advocate for a poultry --
17 contract poultry growers, and if you don't now, I
18 wondered if something had changed.

02:51PM

19 A Again, if I advocate anything, it is a balance
20 of power in markets, cash markets, contracting or
21 whatever. Economic -- basic economic theory
22 indicates that when that balance of power gets out
23 of whack either way, then one side loses and the
24 other side gains. So to the extent that my analysis
25 of contract poultry growers in the last ten years or

02:51PM

02:52PM

1 so shows that they're not making a competitive
2 return for labor and capital and management and
3 risk, then, yes, I'm speaking out on their behalf,
4 but the roles could be reversed and I would change
5 over.

02:52PM

6 Q I look forward to seeing that. If you're not
7 an advocate for poultry growers, I take it you're
8 not an advocate against poultry companies?

9 A No.

10 Q But you're no fan of Cargill, are you?

02:52PM

11 A I don't -- I know very little --

12 MR. RIGGS: Object to the form.

13 A I know very little about Cargill. As you know
14 better than I do, it's the world's largest private
15 corporation and not much is known about it, and I
16 have nothing against the vertically integrated model
17 of poultry production other than the fact that
18 there's a disparity in bargaining power.

02:52PM

19 Q Do you recall your testimony about six months
20 ago in the Schauer case? Am I pronouncing that
21 correctly, Schauer?

02:53PM

22 A I think so.

23 Q That's the case where the defendant is
24 Cargill; correct?

25 A The turkey -- the Gonzales Turkey, yes.

02:53PM